

17-201407

McCABE, WEISBERG & CONWAY, P.C.
By: Marisa M. Cohen, Esq., (Atty. I.D.# MMC87830)
216 Haddon Avenue., Suite 201
Westmont, NJ 08108
(856) 858-7080

Attorneys for Movant: Citizens Bank of Pennsylvania

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEW JERSEY

Camden Vicinage

IN RE:	Case No.: 17-20852-JNP
Angelina Redding Debtor/Respondent	Chapter: 13 Judge: Jerrold N. Poslusny Jr.
John G Redding Co-Debtor/Respondent	CERTIFICATION IN SUPPORT OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY

I, Kevin Leahy, do hereby certify:

1. I am a BK Specialist at Citizens Bank of Pennsylvania and I have complete knowledge of the amount due on the within obligation and mortgage and I am authorized to make this certification.

2. Citizens Bank of Pennsylvania is the holder of a mortgage on real property owned by the Debtor and located at 315 West Wildwood Avenue, Wildwood, New Jersey 08260 ("Premises"), recorded in the Office of the Clerk of Cape May County.

3. The mortgage executed by the Debtor grants the Movant a lien on the Premises.

4. Respondent, John G Redding is a co-debtor with regard to the aforementioned mortgage/note and is a joint owner of the Premises along with the Debtor.

5. The Debtor has defaulted upon the note and mortgage as to post-petition payments.

6. Movant has not received payments on the note and it lacks adequate protection of its interest for the months of May 2019 through October 2019.

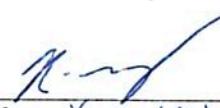
7. As of October 9, 2019, Movant has incurred attorney's fees in connection with this Motion.

8. The amount of the Debtor's monthly payment and the total post-petition arrears due and owing are provided on the attached Certification regarding the Post-Petition Payment History.

9. This certification is made in support of the Motion for Relief from the Automatic Stay so that Movant, Citizens Bank of Pennsylvania may exercise all its rights under the applicable non-bankruptcy law and to move to protect its rights under the mortgage contract.

10. I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Date: 10/21/19


Name: Kevin Leawy
Title: BK Specialist

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

McCABE, WEISBERG & CONWAY, LLC

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Attorneys for Movant: Citizens Bank of
Pennsylvania

In Re:

Case No.: 17-20852-JNP

Angelina Redding
Debtor/Respondent

Chapter: 13

John G Redding
Co-Debtor/Respondent

Judge: Jerrold N. Poslusny Jr.

**CERTIFICATION RE POST-PETITION PAYMENT HISTORY
(NOTE AND MORTGAGE DATED MAY 31, 2006)**

Kevin Leahy of full age, employed as BK Specialist
by Citizens Bank, NA, hereby certifies the following information:

BACKGROUND INFORMATION

1. Recorded on 06/13/20006 in Cape May County, in Book 4385 at Page 507
2. Property Address: 315 West Wildwood Avenue, Wildwood, New Jersey 08260
3. Mortgage Holder: Citizens Bank of Pennsylvania
4. Mortgagor(s)/Debtor(s): Angelina Redding.

POST-PETITION PAYMENTS (Petition filed on May 26, 2017)

Amount Due	Date payment Was Due	How Payment Was Applied (Mo./Yr)	Amount Received	Date Payment Received	Suspense Balance
\$387.34	06/05/2017	06/2017	\$387.34	07/17/2017	\$0.00
\$387.34	07/05/2017	07/2017	\$387.34	08/24/2017	\$0.00
\$387.34	08/05/2017	08/2017	\$387.34	10/20/2017	\$0.00
\$387.34	09/05/2017	09/2017	\$1,162.02	11/16/2017	\$774.68
\$387.34	10/05/2017	10/2017	\$387.34	From Suspense	\$387.34
\$387.34	11/05/2017	11/2017	\$387.34	From Suspense	\$0.00
\$387.34	12/05/2017	12/2017	\$387.34	12/26/2017	\$0.00
\$387.34	01/05/2018	01/2018	\$774.68	02/26/2018	\$387.34

\$387.34	02/05/2018	02/2018	\$387.34	From Suspense	\$0.00
\$387.34	03/05/2018	03/2018	\$774.68	04/13/2018	\$387.34
\$387.34	04/05/2018	04/2018	\$387.34	From Suspense	\$387.34
\$387.34	05/05/2018	05/2018	\$387.34	05/19/2018	\$0.00
\$387.34	06/05/2018	06/2018	\$500.00	05/31/2018	\$112.66
\$387.34	07/05/2018	07/2018	\$387.34	07/16/2018	\$112.66
\$387.34	08/05/2018	08/2018	\$387.34	08/22/2018	\$112.66
\$387.34	09/05/2018	09/2018	\$774.68	11/01/2018	\$500.00
\$387.34	10/05/2018	10/2018	\$387.34	From Suspense	\$112.66
\$387.34	11/05/2018	11/2018	\$387.34	12/28/2018	\$112.66
\$387.34	12/05/2018	12/2018	\$387.34	02/11/2019	\$112.66
\$387.34	01/05/2019	01/2019	\$387.34	02/22/2019	\$112.66
\$387.34	02/05/2019	02/2019	\$387.34	05/16/2019	\$112.66
\$387.34	03/05/2019	03/2019	\$387.34	07/17/2019	\$112.66
\$387.34	04/05/2019	04/2019	\$387.34	09/25/2019	\$112.66
\$387.34	05/05/2019	N/A	N/A		\$112.66
\$387.34	06/05/2019	N/A	N/A		\$112.66
\$387.34	07/05/2019	N/A	N/A		\$112.66
\$387.34	08/05/2019	N/A	N/A		\$112.66
\$387.34	09/05/2019	N/A	N/A		\$112.66
\$387.34	10/05/2019	N/A	N/A		\$112.66
TOTAL:			\$10,958.18		\$112.66
\$11,232.86					

[Continue on attached sheets if necessary.]

Monthly payments past due: 6 mos. x \$387.34
(\$2,324.04 - \$112.66) = \$2,211.38 as of October 9, 2017

Each current monthly payment is comprised of:

Principal & Interest... \$387.34
Other..... \$0.00 (Specify:)
TOTAL..... \$387.34

If the monthly payment amount has changed during the pendency of the case, please explain (attach separate sheet(s) if necessary): N/A

PRE-PETITION ARREARS: \$10,686.24

I certify under penalty of perjury that the above is true.

10/21/19
Date:


Signature